

UNITED STATES OF AMERICA
IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

MOUNT HOPE CHURCH,

Plaintiff,

-vs-

BASH BACK!; BASH BACK! LANSING;
GINA ELEYNA WERTZ; KRISTY
ELIZABETH BOUSQUET; AMY
MICHELLE FIELD; JASON DAVID
HATZ; CAILIN ELIZABETH MAJOR;
WENDY RENAE DEBNAR; MICHELE
NICOLE TROUTMAN; SAMUEL D.
KREUGER; NATHAN JAMES KELLER;
ANTON BOLLEN; DEVIN SCOTT
MERGET; DANIEL A. REGENSCHEIT;
RYAN LEVITT; ALLISON MARGARET
PENNINGS; JOHN DOES 1-20,

Defendants.

Case Number: 1:09-cv-427
Hon. Robert Holmes Bell

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Karl A. H. Bohnhoff (P10957)
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**DEFENDANT NATHAN JAMES KELLER'S AFFIRMATIVE DEFENSES TO
PLAINTIFF'S COMPLAINT FOR PERMANENT INJUNCTION AND DAMAGES**

NOW COMES the Defendant, NATHAN JAMES KELLER, individually by and through his attorneys, BOHNHOFF & MAHONEY, PLC and for his Affirmative Defenses states as follows:

1. Plaintiff's Complaint, in whole or in part, as to Defendant NATHAN JAMES KELLER, fails to state acclaim(s) upon which relief can be granted as a matter of fact and or law.
2. Plaintiff's claim(s), as to Defendant NATHAN JAMES KELLER, are barred by applicable statutes of limitation and or jurisdictional prerequisites.
3. Plaintiff's claim(s), as to Defendant NATHAN JAMES KELLER, operate to deny him fundamental and protected rights of freedom of speech and movement provided under Amendment One of the Constitution of the United States and Article One, Section Seven of the Constitution of the State of Michigan.
4. Defendant, NATHAN JAMES KELLER, reserves the right to add affirmative defenses as may become necessary in the course of discovery proceedings or otherwise.

Respectfully submitted,

BOHNHOFF & MAHONEY, PLC

Dated: June 1, 2009

/s/ Michael S. Mahoney
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